4317 Courtland Drive Metairie, LA 70002 August 13, 1999

Secretary Federal Trade Commission Room H-159 600 Pennsylvania Ave., NW Washington, DC 20580

Re: 16 CFR Part 453

Dear Secretary,

The FTC has asked consumers to comment on changes of the Funeral Rule. While the current "General Price List" is an excellent foundation to aid the bereaved relatives during an emotional time, perhaps with additions and modifications, it can become a better tool for the bereaved.

Definitely the scope should be expanded to include cemeteries, monument dealers, casket sellers (I've read about inter-net retail casket dealers, ergo be cautious on your legalese wording). I have also read about "cyber-memorials," so one might want to follow up on it, and its' potential implications.

A redefinition of "funeral provider" should also be considered. I had my parents ashes distributed over the Pacific Ocean, so potentially the airplane pilot and his helper could be defined as funeral providers.

The clarification of unbundling the provisions is an absolute must. It is like a line-item veto, and allows the consumer to have greater control during a time when their emotions can be manipulated. Funeral homes should be required to list what is minimally legally required for burial vs. cremation (re: preparation of the body, etc). And, considering the influx of immigrants, perhaps something discussing the potential costs and legal requirements for shipping the deceased back to their country of origin should be included. Brochures in Spanish (perhaps for regions heavily populated with specific ethnic groups, then their language or customs should be included), enlarged print, Braille and audio-tape must be available.

For that matter, one might consider having the format of the "General Price List" modified to be similar in concept to the annual energy consumption stickers on major appliances (where that specific model is compared to the industry range of lowest energy to highest energy consumption). The consumer must not only know the prices for each line item, they must also know the local comparison prices. And most importantly, the consumer must be advised that they have the right to have the deceased moved to another funeral home, if the consumer is not satisfied with the prices, etc. Rarely do deaths and funerals occur at a convenient time, so funeral homes have an emotional advantage over



the bereaving family, which can potentially translate into a strong financial gain for the funeral home.

Absolutely everything must be clarified (re: basic service fee), and perhaps one should consider that the funeral industry provide some "generic/overview" brochures on available line items, etc at the hospitals and rest homes, so consumers can prepare themselves and not be overwhelmed by sticker shock.

If you have any questions or comments, please give me a call: (504) 779-1577 or contact me at the above address.

Regards,

Stephanie Lawrence